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VIA ECF

Hon. Katherine B. Forrest
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Hosseinzadeh v. Klein, et al (16-cv-3081)

Dear Judge Forrest:

This firm represents the plaintiff Matt Hosseinzadeh (“**Plaintiff**”) in the above-referenced matter.

We have met and conferred with opposing counsel pursuant to the Court’s order (Dkt. 42) (the “**Order**”). Counsel have agreed that defendants will serve updated responses to Plaintiff’s discovery requests, anticipated later today, with responsive documents to follow within a reasonable time.

We write this letter, with consent of opposing counsel, to withdraw our letter motion to compel production (Dkt. 31) without prejudice to filing a new motion depending on the substance of defendants’ updated responses and objections.

Accordingly, we further request that the Court dissolve its Order requiring the defendants to oppose the foregoing motion on December 5, 2016 as moot.

Plaintiff otherwise respectfully reserves its rights in connection with the facts and circumstances underlying the Order.

Respectfully submitted,
/s/ Tim Bukher
Tim Bukher

Cc: Michael Feldberg, Esq., Thompson Bukher LLP (via electronic transmission); Michael Lee, Esq., Morrison Lee LLP (via electronic transmission); Allison Rothman, Esq., Morrison Lee LLP (via electronic transmission); Caroline A. Morgan, Fox Rothschild LLP (via electronic transmission); Jeffrey S. Kravtiz, Fox Rothschild LLP (via electronic transmission); Rom Bar-Nissim, Fox Rothschild LLP (via electronic transmission).